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H4AR
12.5.1
8/7/12



RE: Remaining Issues on the Draft Final EW Screening Memo

Dan Berlin

to:

Ravi Sanga

08/07/2012 10:11 AM

Cc:

Debra Williston - Work, "Debra Williston - Home", Gary Pascoe, Doug Hotchkiss, Jeff Stern, "Kerri Scott", Lori Russo, Matt Woltman, Pete Rude, Reid Carscadden, Scott Becker, Susan McGroddy, Kym Anderson, Tom Wang, "Weiss, Rebecca Ann @ NWS (Rebecca.A.Weiss@usace.army.mil)", "pleon@parametrix.com", "Joe.z.gailani@uace.army.mil", Derek Ormerod

Hide Details

From: Dan Berlin <dberlin@anchorqea.com> Sort List...

To: Ravi Sanga/R10/USEPA/US@EPA

Cc: Debra Williston - Work <debra.williston@kingcounty.gov>, "Debra Williston - Home" (b) (6) Gary Pascoe (b) (6) <hotchkiss.d@portseattle.org>, Doug Hotchkiss <jeff.stern@kingcounty.gov>, "Kerri Scott" <kscott@anchorqea.com>, Lori Russo <lrusso@anchorqea.com>, Matt Woltman <mwoltman@anchorqea.com>, Pete Rude <pete.rude@seattle.gov>, Reid Carscadden <rcarscadden@integral-corp.com>, Scott Becker <sbecker@integral-corp.com>, Susan McGroddy <susanm@windwardenv.com>, Kym Anderson <anderson.k@portseattle.org>, Tom Wang <twang@anchorqea.com>, "Weiss, Rebecca Ann @ NWS (Rebecca.A.Weiss@usace.army.mil)" <Rebecca.A.Weiss@usace.army.mil>, "pleon@parametrix.com" <pleon@parametrix.com>, "Joe.z.gailani@uace.army.mil" <Joe.z.gailani@uace.army.mil>, Derek Ormerod <dormerod@anchorqea.com>

2 Attachments



image001.gif EW Final Remedial Alternatives Screening Memo_7-29-12.docx



USEPA SF



1398438

Ravi,

Attached is the revised EW Screening Memo with just a few redlines. The changes were made according to the responses listed below for each of your comments. Ideally these responses meet your needs, and you'll be able to approve the Screening Memo.

EPA Comment: RTC #7 – Section 2.6.3 pg 24. The text notes that “Localized disturbance to sediments deeper than 10 cm could occur within Slip 27 and south of Slip 27 (e.g., as a result of extreme propwash forces associated with emergency maneuvering), but geochronology results do not indicate mixing below the top 10 cm.” Geochronology in this area is limited to 1 core. Therefore, this core does not represent the extent of localized disturbances that occur throughout Slip 27 and must not be used as an indicator that deep mixing is unlikely. Remove “but geochronology results do not indicate mixing below the top 10 cm” from the text.

EWG Response: *The text is accurate for sediment near the geochron core, but potentially not for the entirety of Slip 27. Text has been modified to “Localized disturbance to sediments deeper than 10 cm could occur within Slip 27 and south of Slip 27 (e.g., as a result of extreme propwash forces associated with emergency maneuvering), but geochronology results do not indicate mixing below the top 10 cm in the area represented by the geochron core.”*

EPA Comment: RTC #8 – Section 2.6.5, pg 25. The section has added a statement “Because PTM does not consider the redistribution of these particles from propwash forces, some solids from lateral sources could be resuspended and distributed beyond the locations predicted by PTM.” The text needs to be adjusted to also specifically state that the PTM corresponds to the final fate in the absence of any ship traffic.

EWG Response: *Both currents and propwash could resuspend initially deposited sediment. The text has been modified as follows: “Because PTM does not consider the redistribution of these particles from propwash forces or currents, some solids from lateral sources could be resuspended and distributed beyond the locations predicted by PTM. The PTM results therefore correspond to the initial deposition in the absence of any resuspension from propwash forces or currents.”*

EPA Comment: RTC #11 - Change text to state that “While localized disturbance of sediments could result from prop wash force, geochronology results still indicate a net depositional environment.”

EWG Response: *Text changed appropriately.*

New EPA Comment #1 – Section 2.2.4 Tribal and Recreational, 4th paragraph. The screening memo suggests that recreational use of the waterway which could be associated with swimming may increase in the future as ongoing remedial efforts and habitat restoration projects are completed. This is inconsistent with the RI and the HHRA determination for the swimming scenario, please change the text, regarding the swimming scenario, in the screening memo to be consistent with other EW deliverables.

EWG Response: *Sentence has been modified to delete the following text: “The frequency of some of these recreational activities may increase in the future as ongoing remedial efforts and habitat restoration projects are completed, but”*

Thanks
Dan

Dan Berlin

ANCHOR QEA, LLC
dberlin@anchorqea.com

From: Ravi Sanga [<mailto:Sanga.Ravi@epamail.epa.gov>]

Sent: Friday, June 08, 2012 12:39 PM

To: Dan Berlin

Cc: Debra Williston - Work; Debra Williston - Home; Gary Pascoe; Doug Hotchkiss; Jeff Stern; Kerri Scott; Lori

Russo; Matt Woltman; Rude, Pete; R Carscadden; Scott Becker; Susan McGroddy; Kym Takasaki; Tom Wang; Rebecca.A.Weiss@usace.army.mil; peter leon; Joe.Z.Gailani@usace.army.mil
Subject: RE: Remaining Issues on the Draft Final EW Screening Memo

Dan, Tom and Doug, EPA reviewed the EWG response to EPA comments and found the following responses acceptable: 1,2,3,4, 5, 6, 9, 10, 12, 13, 14 & 15. Remaining comments need to be further addressed as noted below. In addition EPA included a few additional comments on the latest draft.

RTC #7 – Section 2.6.3 pg 24. The text notes that *"Localized disturbance to sediments deeper than 10 cm could occur within Slip 27 and south of Slip 27 (e.g., as a result of extreme propwash forces associated with emergency maneuvering), but geochronology results do not indicate mixing below the top 10 cm."* Geochronology in this area is limited to 1 core. Therefore, this core does not represent the extent of localized disturbances that occur throughout Slip 27 and must not be used as an indicator that deep mixing is unlikely. Remove *"but geochronology results do not indicate mixing below the top 10 cm"* from the text.

RTC # 8 – Section 2.6.5, pg 25. The section has added a statement *"Because PTM does not consider the redistribution of these particles from propwash forces, some solids from lateral sources could be resuspended and distributed beyond the locations predicted by PTM."* The text needs to be adjusted to also specifically state that the PTM corresponds to the final fate in the absence of any ship traffic.

RTC #11 - Change text to state that *"While localized disturbance of sediments could result from prop wash force, geochronology results still indicate a net depositional environment."*

New Comment #1 – Section 2.2.4 Tribal and Recreational, 4th paragraph. The screening memo suggests that recreational use of the waterway which could be associated with swimming may increase in the future as ongoing remedial efforts and habitat restoration projects are completed. This is inconsistent with the RI and the HHRA determination for the swimming scenario, please change the text, regarding the swimming scenario, in the screening memo to be consistent with other EW deliverables.

New Comment #2 –Section 2.5.1 Surface Sediment Data, 2nd paragraph, last sentence. Remove "... and CSL"

When the EWG addresses these remaining issues, EPA can approve the document.

Let me know if you have any questions.

regards,

Ravi

Ravi Sanga, MS
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 US EPA Region 10
 Office of Environmental Cleanup
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 fax: (206) 553-0124

▽ Dan Berlin ---04/09/2012 05:27:26 PM---[attachment "RADSSM Comment Responses 4-9-12.pdf" deleted by Ravi Sanga/R10/USEPA/US] [attachment "

From: Dan Berlin <dberlin@anchorage.com>
 To: Ravi Sanga/R10/USEPA/US@EPA
 Cc: Debra Williston - Home (b) (6) Debra Williston - Work <debra.williston@kingcounty.gov>, Doug Hotchkiss <hotchkiss.d@portseattle.org>, Gary Pascoe <(b) (6)>, Jeff Stern <jeff.stern@kingcounty.gov>, Kym Takasaki <takasaki.k@portseattle.org>, "Matt Woltman" <mwoltman@anchorage.com>, Pete Rude <pete.rude@seattle.gov>, "R Carscadden" <rcarscadden@integral-corp.com>, Scott Becker <sbecker@integral-corp.com>, Susan McGroddy <susanm@windwardenv.com>, "Tom Wang" <twang@anchorage.com>, Lori Russo <lrusso@anchorage.com>, Kerri Scott <kscott@anchorage.com>
 Date: 04/09/2012 05:27 PM
 Subject: RE: Additional Comments on the Draft Final EW Screening Memo

[attachment "RADSSM Comment Responses 4-9-12.pdf" deleted by Ravi Sanga/R10/USEPA/US]

[attachment "EW Final Remedial Alternatives Screening Memo_4-9-12_final redlines.pdf" deleted by Ravi Sanga/R10/USEPA/US]

Ravi,

Attached is the Final Remedial Alternative and Disposal Site Screening Memo and response to comments. The attached version is the redline strike out version (text only), to support your review. We have posted the complete clean pdf on the East Waterway website (14.8 MB). Please let me know if you have any trouble downloading the file or have any further comments on the Memo.

Thanks

Dan

Dan Berlin
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dberlin@anchorqea.com

-----Original Message-----

From: Ravi Sanga [<mailto:Sanga.Ravi@epamail.epa.gov>]

Sent: Friday, February 24, 2012 1:15 PM

To: Dan Berlin

Cc: Tom Wang; Doug Hotchkiss

Subject: Additional Coments on the Draft Final EW Screening Memo

Dan -- Here are remaining minor comments/clarifications that did not make it in to the last round of comments on the EW Draft Final Screening Memo. Let me know if you have any questions.

1) Page 28. Section 3. Preliminary Remedial Action Objectives. In the second paragraph it is stated that PRGs and RALs will be developed in the FS, but later on in the section it states that the RAO memorandum will contain the development of PRGs for the RAOs and the RALs. Please clarify which document will first contain the development of PRGs and RALs for the East Waterway.

2) Page 56. Third full paragraph on this page. Text states that "Reactive capping is an implementable way to introduce treatment components into areas where in situ treatment may not be implementable, for example, where wave or propwash forces are particularly strong, and make the implementability of in situ treatment by itself uncertain."

Reactive capping using Granular Activated Carbon may not remain in place during strong propwash forces. Please clarify this in the text.

3) Page 70, Section 4.3.7.2. First paragraph. Paragraph states that "...no contaminated sediment remediation projects in this region have utilized treatment or beneficial reuse of treated sediments." This is not entirely accurate. In Commencement Bay, with the Hylebos, EPA provided oversight for a Removal Action off of Oxychem in an Area called 5106. Sediments in the area were contaminated down to about 20 ft.

below sediment surface with VOCs and SVOCs. Suction dredges were used to remove the material which was tightlined to tanks which were aerated.

The remaining sludge was sampled and either retreated or disposed.

Please change the text accordingly in this section to reflect this.

Please let me know if there are any questions on the above remaining comments.

regards,

Ravi

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